

December 19, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: CC Docket No. 95-116 Telephone Local Number Portability and WC Docket No. 09-109 Petition of Telcordia Technologies, Inc.; Transition of the Local Number Portability Administrator

Dear Ms. Dortch:

By this letter, the Connecticut Public Utilities Regulatory Authority (Authority) and the Vermont Public Service Board (Board) take no position on the award of the local number portability (LNP) contract to the successful vendor. We are, however, concerned that if there is a transition from Neustar, Inc. (Neustar) to Telcordia Technologies, Inc. (Telcordia), current LNP functionalities as related to national security and public safety continue to function at the same level after the transition to the new administrator as they did prior to the transition.

The Authority and the Board are aware that the Federal Communications Commission (Commission or FCC) has not yet affirmed the North American Numbering Council's recommendation that the Local Number Portability Administrator (LNPA) be transitioned from Neustar to Telcordia. According to the project plan, the transition is expected to be completed by June 28, 2015. That plan also included a sufficient period of time to test the functionalities as they transferred to the new vendor. Since the final award has not yet been made, the period of time for testing is declining. Moreover, it is not clear that all current functionalities provided by Neustar will be transitioned and tested. Consequently, we are concerned about the potential for disruption in functionality of the LNP system if it is transitioned to a new administrator without comprehensive testing.

Of interest to the Authority and the Board are various functionalities including, but not limited to, disaster recovery, such as Neustar's LNP Enhanced Analytical Platform (LEAP), Wireless Do Not Call List Service (WDNCLS), and the Port Power Search (PPS) function. While the LEAP and WDNCLS were addressed by the LNP contract's RFP, the Authority and Board are concerned because necessary testing and transition details appear to remain unaddressed, leaving us uncertain as to whether sufficient time remains to conduct the testing to ensure that they are fully functional on June 28, 2015.

The Authority and Board are also concerned as to whether the PPS function will be available upon transition for the same reasons.

Given that the Commission has not yet formally awarded the LNPA contract to Telcordia, the Authority and Board recommend that, if comprehensive testing of all of these functionalities cannot be completed in a timely fashion, the FCC consider a delay of the project's planned June 28, 2015 transition date to allow for the comprehensive testing of all LNP functionalities.

Sincerely,

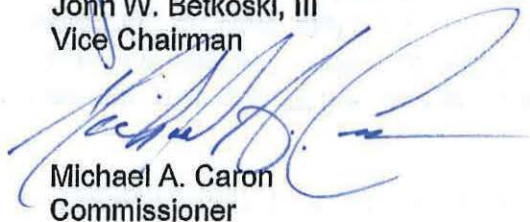
Public Utilities Regulatory Authority



Arthur H. House  
Chairman

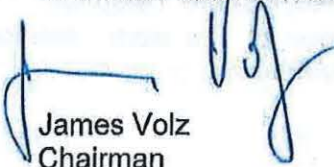


John W. Betkoski, III  
Vice Chairman



Michael A. Caron  
Commissioner

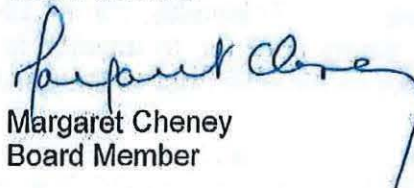
Vermont Public Service Board



James Volz  
Chairman



John D. Burke  
Board Member



Margaret Cheney  
Board Member